

**Sills Cummis & Gross**  
A Professional Corporation

The Legal Center  
One Riverfront Plaza  
Newark, New Jersey 07102-5400  
Tel: 973-643-7000  
Fax: 973-643-6500

Jeffrey J. Greenbaum  
Member  
Direct Dial: (973) 643-5430  
E-mail: jgreenbaum@sillscummis.com

101 Park Avenue  
New York, NY 10112  
Tel: 212-643-7000  
Fax: 212-643-6500

April 30, 2025

**By ECF**

The Honorable Freda L. Wolfson, U.S.D.J. (ret.)  
Lowenstein Sandler LLP  
Roseland, New Jersey 07068

**Re: Unopposed Letter Motion to Supplement Second Amended Complaint  
*Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC, et al.*,  
Case No. 22-2632 (CCC) (CLW)**

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Dear Judge Wolfson:

On behalf of Plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”), we submit this letter motion to amend one sentence in JJHCS’s pleading, for the purpose of updating the list of Janssen drugs with CarePath terms and conditions that bar SaveOnSP by name. Defendants do not oppose JJHCS’s motion, as set forth in Exhibit A.

JJHCS makes this motion under Rules 16(b) and 15(d), and pursuant to Your Honor’s ruling that “factual allegations based on forthcoming updates to CarePath’s terms and conditions—yet to be implemented—must be added separately by way of a motion.” D.E. 569 at 24 n.11. Because this motion is unopposed, we have not submitted a full memorandum of law in support of it, but would be happy to do so if that would be helpful to Your Honor.

Pursuant to L. Civ. R. 15.1, JJHCS has prepared a Proposed Supplemented Second Amended Complaint (Exhibit B) along with a redline showing changes from JJHCS’s Second Amended Complaint (Exhibit C). The updated allegation appears in Paragraph 180. A proposed form of Order is also attached. If it meets with Your Honor’s approval, we respectfully request that Your Honor recommend that the District Court enter the Order on the docket.

As always, we appreciate Your Honor’s attention to this matter.

Respectfully submitted,

s/ Jeffrey J. Greenbaum  
JEFFREY J. GREENBAUM